



# THE INSTITUTE OF Company Secretaries of India

## भारतीय कम्पनी सचिव संस्थान

IN PURSUIT OF PROFESSIONAL EXCELLENCE  
Statutory body under an Act of Parliament  
(Under the jurisdiction of Ministry of Corporate Affairs)

MCA: 2022

October 31, 2022

Shri Manoj Govil, IAS  
Secretary  
Ministry of Corporate Affairs  
Government of India  
Shastri Bhawan  
New Delhi - 110 001

**Subject: Request for extension of time period for filing of financial statements for the financial year ended 31.03.2022 without levying additional fee - Reg.**

Sir,

This has reference to the ICSI representations dated October 11, 2022 and October 21, 2022 (copy enclosed) made pertaining to extension in the timelines provided under section 137 of the Companies Act, 2013 for filing of financial statements with the Registrar i.e. within thirty days from the date of annual general meeting and also personal meetings held during this month.

We request to kindly consider granting extension of time for filing of financial statements for the financial year ended 31.03.2022 up to **31st December, 2022** without levying additional fee. The reasons for our submission are as under:

- with the MCA notification no. G.S.R. 207(E) dated 24.03.2021 made effective from April 01, 2021 mandating round-off of the figures appearing in the Financial Statements but absolute figures required to be filed in Form AOC-4; it is taking extra time for filling and filing of audited financial statements. It is causing difficulty for XBRL filings also.
- on last two days, the professionals faced the following problems while filing these forms:
  - there was problem in log-in into the portal. System showed the message 'gateway time out'
  - in case, they were able to login, they weren't able to upload the forms.
  - even if the SRN was generated, the payment gateway was stuck.
  - while filing the form, the system showed the message, 'load on system'
  - not able to register DSC
- Central Board of Direct Taxes (CBDT) on consideration of difficulties faced by the taxpayers and other stakeholders, has vide circular No. 19/2022 dated 30.09.2022, granted 7 days extension for filing of audit reports for the Assessment Year 2022-23 i.e. from 30th September, 2022 to 07th October, 2022 for filing of various reports of audit for the Assessment Year 2022-23. So, concerned professionals were busy with filing of ITR;
- dates of filing financial statements is coinciding with the varied festivals (Diwali, Bhai Dooj, Chhath Puja, etc.) celebrated across the length and breadth of the nation, during which corporates and professional workspaces are closed temporarily. During this period, there is lack of manpower and support staff which add to the woes.

Ad. Reviewed  
31/10/22

### Vision

"To be a global leader in promoting good corporate governance"

### Motto

सत्यं वद। धर्मं चर। इष्टकारं कुरु। तृप्तये त्वयि कुरु।

### Mission

"To develop high calibre professionals facilitating good corporate governance"

Connect with ICSI

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The objective of filing is to ensure maximum compliances and updation of Registry, which has been defeated due to above mentioned reasons. The extensions granted by you during the past years have not only promoted ease of compliance but have been a key role player in strengthening the governance framework.

Considering the above issues faced by corporates and professionals, you are requested to kindly consider granting extension of time for filing of financial statements for the financial year ended 31.03.2022 up to **31st December, 2022** without levying additional fee.

We shall be pleased to provide any further information or clarification in this regard on hearing from your goodself.

Thanking You,

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Asish Mohan'.

(CS Asish Mohan)  
Secretary  
The ICSI

CC: Shri Manoj Pandey, Joint Secretary

Attachments:

1. Representation dated October 11, 2022; and
2. Representation dated October 21, 2022